

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

DANIELLE CIRILLO, on behalf of herself )  
and all others similarly situated, )

*Plaintiff,* )

v. )

CITRIX SYSTEMS, INC., )

*Defendant.* )

Civil Action No.: 5:21-cv-00088-BO

SABRINA STILES, on behalf of herself and )  
all others similarly situated, )

*Plaintiff,* )

v. )

CITRIX SYSTEMS, INC., )

*Defendant.* )

Civil Action No.: 5:23-cv-00060-BO

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS  
AND COLLECTIVE ACTION SETTLEMENT; PRELIMINARY CERTIFICATION OF  
THE RULE 23 SETTLEMENT CLASS; APPOINTMENT OF PLAINTIFFS' COUNSEL  
AS CLASS COUNSEL; APPROVAL OF SETTLEMENT ADMINISTRATOR; AND  
APPROVAL OF PLAINTIFFS' NOTICE OF SETTLEMENT**

Pursuant to Fed. R. Civ. P. 23 and 29 U.S.C. § 216(b), and based on the accompanying memorandum of law, Plaintiffs respectfully move this Court, consistent with the Parties' Stipulation and Settlement Agreement, to (1) preliminarily certify the alleged *Stiles* Rule 23 class in this action solely for purposes of the proposed settlement, and to appoint the undersigned as class counsel for the purpose of settlement; (2) grant preliminary approval of the proposed class and collective action settlement (the Parties' "Stipulation and Settlement Agreement"); (3) approve the appointment CPT Group, as Settlement Administrator; and (4) approve the proposed Notice of

the Settlement and Claim Form. The Parties' Stipulation and Settlement Agreement, proposed Notice, and Proposed Order are submitted herewith.

Counsel for Plaintiffs has conferred with counsel for Defendant and, consistent with the agreement in the Parties' Stipulation and Settlement Agreement, Defendant does not oppose the instant motion. The Parties agree that they are entering into a compromise of a disputed claim and that this settlement is not an admission of liability, wrongdoing, or the validity of the claims or defenses.

Respectfully submitted this July 12, 2023.

/s/ Gilda A. Hernandez

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 12, 2023, I electronically filed the foregoing true and accurate copy of **PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS AND COLLECTIVE ACTION SETTLEMENT; PRELIMINARY CERTIFICATION OF THE RULE 23 SETTLEMENT CLASS; APPOINTMENT OF PLAINTIFFS' COUNSEL AS CLASS COUNSEL; APPROVAL OF SETTLEMENT ADMINISTRATOR; AND APPROVAL OF PLAINTIFFS' NOTICE OF SETTLEMENT** with the Court using the CM/ECF system, and have thereby electronically served the document to the following:

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